

Oregon Department of Environmental Quality
Attn: Emil Hnidey
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

August 15, 2018

Oregon Department of Forestry
Attn: Jenna Nelson
2600 State Street
Salem, Oregon 97310

To Whom It May Concern:

On behalf of the Oregon Wild, we thank you for the opportunity to provide comments to the Oregon Department of Forestry (ODF) and Oregon Department of Environmental Quality (DEQ) concerning the proposed rule changes to Oregon's Smoke Management Plan. This summer's fire season in Oregon and across the West is yet another reminder that there is more work to be done reducing potentially unnaturally intense fires through the use of prescribed fire. In Central Oregon, we and our partners are taking proactive steps to reduce the risk of wildfires near communities, including the strategic use of prescribed fire in the forests immediately around our communities. To continue this work we need a holistic and forward-thinking smoke management policy in Oregon.

We appreciate the work by ODF and DEQ staff in leading the smoke management plan review and we support the effort to align Oregon's smoke management rules with the federal Clean Air Act 24-hour National Ambient Air Quality Standards (NAAQS). We believe that using the NAAQS (including the proposed buffer of 75% of the NAAQS) to define smoke intrusion strikes is a step in the right direction. We support a healthy balance between protecting public health and allowing critical prescribed burning to occur as we work together to confront the very real wildfire threat facing our communities.

For this reason, we have significant concerns with the 1-hour threshold, which runs counter to our interest in a smoke management policy that accounts for the short and long-term consequences of wildfire. Data shows that the 1-hour threshold would impose a significant limitation on the very prescribed burning priority areas that are most critical to our community wildfire protection efforts here in Central Oregon.

We also support a clear, simple, and attainable process to obtain an exemption from the 1-hour smoke threshold when communities have implemented a smoke communication and mitigation plan.

Thank you for the opportunity to provide comment on the proposed rules. The fire-prone forests of Central Oregon will burn sooner or later. We can however influence to some degree when and how they will burn: in a controlled manner during carefully planned and implemented prescribed fire or during out-of-control wildfires. In light of the science on this topic, we believe that the short-term smoke impacts of prescribed fire will be far less than the impacts of wildfire in the long-run and we urge you to adopt the proposed rules so we can do what is needed to protect our forests, communities, and firefighters now and in the future.

Respectfully,

Erik Fernandez
Wilderness Program Manager
Oregon Wild